

COMMENTS OF GREATER MEDIA BOSTON (WBOS, WKLB, WMJX, WROR, WTKK)

A. INTRODUCTION

Greater Media Boston operates five FM radio stations (WBOS, WKLB, WMJX, WROR, and WTKK) that are licensed to communities in the Boston, Massachusetts area. We strive to provide programming that is responsive to the unique interests and needs of the Greater Boston community. Our comments below address specific issues raised in the Commission's Notice of Inquiry.

B. COMMUNITY PROGRAMMING AND PUBLIC AFFAIRS

Greater Media Boston has found that through a combination of self-designed ascertainment procedures, listener and community outreach, and an open line of communication with our listeners, our stations are well-informed about the interests and concerns of the communities we serve. Responding to these interests and concerns is a critical component in attracting and maintaining a loyal listener base, which is in turn critical to our success in generating advertising revenue.

Our stations engage in a multi-pronged approach to determine the problems, needs, and interests of their communities. First, the stations regularly solicit input from listeners regarding issues of interest and importance to the community, both through on-air announcements and on the station websites. Listener suggestions are communicated by e-mail, regular mail, and phone. (E-mail received from listeners is answered by the stations' program directors whenever possible, while direct e-mail to on-air personalities is answered by the specific addressee. Any e-mail relating to a station's operations is duly forwarded to the station's public file.) Second, many of the stations conduct regular polls and research on their websites, including seeking listener opinions about news and public affairs programming and events. Third, many stations invite community leaders to suggest topics of importance to their constituents, or ask station members to participate in local community organizations such as local Chambers of Commerce to get a better idea of local concerns. In addition, station management and on-air personnel regularly monitor a number of news sources for topics of importance and for breaking news.

Each of our stations broadcasts daily programming that provides current news, weather, and traffic information. This information is obtained from local and national services, as well as in-house monitoring of major news sources, and is delivered by local on-air personnel. News and weather updates generally are broadcast every half-hour during prime morning drive hours, ranging from 20-35 reports per station per week. Many stations include afternoon updates, stock reports, and breaking news. For example, WMJX runs seven newscasts per morning starting at 5:00 a.m. (the earliest start time of any FM station in Boston), every half-hour for a total of 35 newscasts per week. The station also runs headline updates at 4:50 and 5:50 p.m. when something of note has happened during the workday. Weather updates are available at all times on the station web site at www.magic1067.com. News reports offer listeners up-to-the-minute information on local, national and international events, and also focus on issues of concern to our listeners, including the economy, environment, health, and lifestyle. Each report is live,

delivered with the latest weather forecast and current weather conditions. News reports also include information on sports events of interest to the local community.

Our traffic reports provide listeners with the latest information on accidents, road hazards and slowdowns, and offer alternative routes around problem areas. Each report covers major transportation routes in and around the metropolitan area and also covers routes used for interstate travel between adjacent states. Traffic reports occur frequently during the peak morning drive hours and occasionally during afternoon drive as needed.

Our news/talk station, WTKK, broadcasts continuous programming designed to inform and provoke thought among our listeners, including talk shows featuring local personalities such as Margery Eagan, Jim Braude and Mike Barnicle. In addition, each station broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Although the majority of our public affairs programming is produced locally in the station's community, we find that our listeners have many interests and concerns that are more universal. For this reason, our public affairs programming includes nationally syndicated programs that address specific issues of concern to our audience, such as women's health, parenting, and financial planning. We believe these programs provide important and current information that may not otherwise be readily available to our listeners. Examples of our public affairs programming include:

- WMJX airs two locally-produced public affairs programs each week. *Boston Life*, a 30-minute show hosted by WMJX news director Gay Vernon, comprises long-form interviews with local community and political leaders. *Exceptional Women*, a 30-minute show hosted by Ms. Vernon and WMJX's assistant program director Candy O'Terry, includes long-form interviews with local and non-local women whose accomplishments are an inspiration to WMJX listeners.
- WBOS maintains a strong commitment to community issues and concerns through its radio program *Greater Boston Today* (also broadcast on WKLB and WROR), a locally originated public service program that airs weekly. WBOS actively seeks listener input regarding issues raised during *Greater Boston Today*, and also solicits listener's comments, concerns and critiques with on-air announcements and during station events. WBOS uses listener input, along with monitoring of local and regional newspapers and TV and radio broadcasts, to identify local issues and concerns. WBOS contacts community religious and political leaders in Brookline by mail to specifically seek their input regarding issues of importance to the community. WBOS, WKLB and WROR also air *The Parent's Journal*, a 30-minute weekly program devoted to issues about raising children in a healthy, supportive environment.

Our stations also include regular programming features designed to inform their listeners about local events of interest. For example, the morning show on WROR frequently broadcasts information and announcements about local museum openings, special events and engagements at local cultural centers, area fairs, theatre events, and fire and police outreach programs. These events are also frequently featured in station PSAs if they are charitable in nature.

Our stations air dozens of public service announcements (PSAs) each week. WROR airs at least one PSA per shift per daypart, 24 hours a day. Stations also broadcast PSAs on general topics, such as WROR's promotion of free mammogram clinics during National Breast Cancer Awareness Month, and provision of information about food and blood drives for victims of natural disasters. WROR also has partnerships with the March of Dimes Walk and Walk Far for NAAR - National Alliance for Autism Research, each of which includes a high volume of promotional mentions and PSAs. WMJX runs 36 PSAs per week for issues and events that are of interest to our audience (as determined by the research described below). The station focuses on issues important to women and families.

Greater Media Boston stations air promotional announcements and live broadcasts from numerous civic and fundraising events, such as local fairs and charity races. WROR (Boston) has established an annual tradition of broadcasting the morning show live from a local firehouse during the week before Thanksgiving. Each year, WROR coordinates with local sponsors to donate a product or service the firehouse needs, including new ovens, furniture, or a gift certificate for building products.

Our stations also feature special programming with civic and charitable goals. For example, WROR broadcasts an annual "Salute the Troops" weekend, during which local listeners call with well-wishes for their loved ones serving in the military overseas. WROR records these messages and sends them to the listeners so they can share them with the soldiers. WROR also enjoyed a partnership with Red Sox pitcher Curt Schilling during the 2004 baseball season, in which Mr. Schilling was a weekly call-in guest to the WROR morning show, offering his insights on baseball and promoting his fight against ALS (Lou Gehrig's disease). WROR's partnership with Curt Schilling raised approximately \$130,000 this year for the ALS Association.

We also use our websites to promote local events and charitable causes. The WROR website offers a "Community Forum" containing descriptions of and links to over 40 local charities, and a special section highlighting a Charity of the Month. Last month, WROR promoted the Kids in Need Holiday Drive, a drive to gather toys, books and games for children living in domestic violence shelters. The site currently contains links to organizations providing relief to the tsunami victims in Southeast Asia. WTKK's website includes a "Community Affairs" page, which provides information about several current charitable events and fundraisers. Most recently, WTKK highlighted a blood drive in Boston for the American Red Cross, the "Globe Santa" project, which provides gifts to needy children during the holiday season, and is currently promoting The Massachusetts Soldiers' Legacy Fund, supporting the children of soldiers killed in action.

C. POLITICAL PROGRAMMING

Greater Media Boston's radio stations, particularly its news/talk station, are devoted to promoting political and civic discourse in their respective communities. Our music stations intentionally attempt to provide non-partisan political programming. Examples of our political programming include:

- WTKK-FM provided extensive daily coverage of the 2004 Democratic National Convention in Boston, as well as the 2004 Republican National Convention in New York.
- For several weeks prior to the elections in November, our stations aired non-partisan live announcements by on-air personalities encouraging listeners to vote in the upcoming election, and directing listeners to phone numbers and websites to obtain polling locations, registration deadlines, and other pertinent information.

D. EMERGENCY PROGRAMMING

All of our stations are equipped for EAS broadcasts, although we welcome further discussion on this topic. All of our stations participate in local “Amber Alerts” to assist local authorities in locating missing children. Regular programming is interrupted to broadcast these alerts.

E. CREATION AND SELECTION OF PROGRAMMING

Each of our stations conducts extensive local music testing to design and develop its playlists and other content. We absolutely do not subscribe to any “national” playlists because we believe we have an obligation to play what our listeners want to hear. WMJX features the “Magic Lyric Guarantee: No lyrics that will embarrass you in front of your kids,” which has been very well received by the station’s core audience.

The stations perform periodic comprehensive reviews of all aspects of station programming using strategic telephone studies. Additional music tests are fielded three to four times per year. For example, WMJX conducts regular surveys of the local audience to determine likes, dislikes, tastes and needs, including:

- Focus groups, in which area listeners are solicited to give us open-ended feedback and make programming suggestions. A typical focus group consists of 12-15 people.
- Strategic Studies, generally involving long-form one-on-one interviews with local listeners. Interviewees are asked about their impressions of the station and its programming, such as what elements could be added, improved, or dropped. We interview 600 local listeners for each study.
- Auditorium Tests, conducted three times per year with a minimum of 100 respondents. Listeners vote on which songs they want to hear and which they do not. Personalities are also tested.

WROR has formed a “listener advisory board” (LAB), a group of volunteers from the station listener database who are invited to participate in periodic web-based surveys to provide feedback on the station’s programming, contests, advertising, and all other aspects of listener satisfaction. WROR has held one in-person meeting of the LAB, and sends a monthly e-mail to

the LAB to keep them informed about station and community activities. Our other stations also use their websites as a source of communication with and feedback from listeners.

Many of our stations broadcast regular programming that is designed to spotlight local artists or music outside the station's format. WROR has featured local artists including State Trooper Dam Clarke's Patriotic Songs, Entrain, a local rock band, and Gary Bagarella's Red Sox spirit song. Although it is a "classic hits" station by format, WROR regularly promotes "garage bands," including a weekly broadcast of *Little Steven's Underground Garage*. WBOS airs "Blues on Sunday" every Sunday night from 9:00 p.m. to midnight and a weekly "Over Easy" program featuring acoustic music and rarities. WMJX airs a Sunday morning jazz program, and also provides listeners access to a jazz sub-channel via the internet.

We believe that digital radio and the internet can provide many opportunities to broaden our programming offerings and serve a wider audience. Digital radio offers the potential to broadcast on subchannels, on which alternative programming could be aired. The internet provides limitless opportunities to stream alternative programming, although the current CARP rulings make web streaming somewhat cost-prohibitive, particularly for experimental formats.

F. COMMUNITY ACTIVITIES

Greater Media Boston is a firm believer that our public interest obligations do not begin and end with our programming activities. Each of our stations is an active participant in the Greater Boston community, particularly with respect to sponsoring local fundraisers and bringing attention to issues of local concern and importance. For example:

- WROR's annual Bras for a CauseSM auction auctions off celebrity bras designed by Goldie Hawn, Susan Sarandon, Pamela Anderson, Steven Tyler and local professional athletes, among others, and raised \$30,000 in 2003 and \$25,000 in 2004 for local breast cancer research organizations.
- The annual WMJX Exceptional Women® awards ceremony honors women locally and around the country for their contributions and courage, and raises money for local cancer research and treatment. WMJX has donated over \$100,000 to date to these causes.
- Greater Media Boston's General Manager, Matt Mills, sits on the board of the Genesis Fund, a nonprofit organization that raises money for the specialized care and treatment of New England area children born with birth defects, mental retardation and genetic diseases. WBOS and WROR each produce annual holiday CDs that are available for sale to the public, with all proceeds donated to the Genesis Fund.
- WBOS produces the nation's largest celebration of Earth Day each year as the WBOS Festival for the Earth. In addition to providing a day of great live music, the event includes exhibits from environmental groups and non-profit agencies as well as many high profile speakers. WBOS supports various related events throughout the year, including serving as the radio partner for the Environmental League's Earth Night fundraiser.

- WBOS is the radio sponsor of the Annual SnowBall to benefit Boston inner-city youth, held each year at a local hotel and featuring live local entertainment and a VIP reception hosted by WBOS on-air personalities.
- WKLB has raised over \$1,000,000 for St. Jude Children's Research Hospital through its annual Country Cares Radiothon.
- On several occasions, WKLB has “adopted” individual children who need medical services such as liver transplants, assisting families with fund raising and lending a hand at their events.
- Each WKLB full-time personality lends his/her hand once per quarter by adopting a charity event, publicizing the event on their show, and making an appearance at the event.
- WTKK presented the Guns ‘N Hoses Hockey Challenge doubleheader pitting New York Port Authority Police and Fire Department of New York Hockey Teams against the Boston Police and Fire Department Hockey Teams. In the wake of the September 11th tragedy the first Guns ‘N Hoses Hockey Challenge took place on December 1, 2001. In 2003 all proceeds raised from the event benefited the Boston Police Activities League “Cops and Kids” program and the Boston Firefighter’s Burn Foundation.
- WMJX sponsors, hosts and emcees the annual “Making Strides Against Breast Cancer” walk with the American Cancer Society. The Boston walk is the largest breast cancer walk in the US. WMJX also hosts and emcees the annual “Memory Walk” to benefit Alzheimers research.
- WMJX partners with the Home For Little Wanderers for the annual Foster Parents’ Appreciation and Holiday Wish campaign. Proceeds benefit Dana-Farber Women’s Cancers program.
- WBOS sponsored the "Life Is Good" Pumpkin Festival on Boston Common this past October, proceeds of which benefited Camp Sunshine, a retreat for kids with life threatening illnesses and their families.
- WBOS presented the Rock Art Show at The Prudential Center in October, featuring works of art by famous musicians, proceeds of which were donated to the "I Love Music" foundation, designed to support music education.
- Greater Media Boston personnel participate in Career Days at local high schools and colleges, talking to students about the radio business and giving demonstrations, and also offering on-site tours of our broadcasting facilities.

In short, all of our stations participated in countless local food drives, benefit concerts, holiday toy drives and other charitable events that brightened the lives of the people we serve and provided resources to communities in need.

It is rewarding to know that we have the capacity to bring together local personalities and charitable causes to benefit our communities. Our radio stations are truly local businesses, and we are an integral part of the Greater Boston community. We are proud of our ongoing commitment to localism and the endless generosity of our employees and listeners in giving back to their communities.

G. CONCLUSION

As demonstrated above, each of Greater Media Boston's stations devotes a substantial portion of its air time, financial resources, and outreach efforts to (1) creating an ongoing dialogue with listeners and the general public and (2) using that dialogue to create programming and community events that serve the public interest and address the issues that are most important to each community. We take our public interest obligations very seriously, and we are proud of the service we provide to the Greater Boston community.